



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

TIMOTHY JEROME FISHER,

Defendant.

CR 2:22-cr-00293-ODW

I N D I C T M E N T

[18 U.S.C. § 1344(2): Bank Fraud
and Attempted Bank Fraud;
18 U.S.C. § 1028A(a)(1):
Aggravated Identity Theft]

The Grand Jury charges:

COUNTS ONE AND TWO

[18 U.S.C. § 1344(2)]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. Bank of America, N.A. ("Bank of America") was a financial institution insured by the Federal Deposit Insurance Corporation.
2. Victim R.R. held a business bank account at Bank of America with a bank account number ending in 0830 (the "0830 Account").
3. Victim R.R. also held a Bank of America Business Advantage business credit card account with an account number ending in 0063 (the "0063 Account").

1 B. THE SCHEME TO DEFRAUD

2 4. Beginning on a date unknown to the Grand Jury, and
3 continuing until on or about August 9, 2019, in Los Angeles County,
4 within the Central District of California, and elsewhere, defendant
5 TIMOTHY JEROME FISHER, and others known and unknown to the Grand
6 Jury, knowingly and with intent to defraud, devised, executed, and
7 attempted to execute, a scheme to obtain moneys, funds, assets, and
8 other property owned by and in the custody and control of Bank of
9 America by means of material false and fraudulent pretenses,
10 representations, and promises, and the concealment of material facts.

11 5. The fraudulent scheme operated, and was carried out, in
12 substance, in the following manner:

13 a. Defendant FISHER would obtain personal identifying
14 information and bank account information for victims, including
15 victim R.R.

16 b. Defendant FISHER would use victim R.R.'s personal
17 identifying information and bank account information to cause Bank of
18 America to send correspondence related to R.R.'s bank accounts to
19 defendant FISHER's residence.

20 c. Defendant FISHER would use R.R.'s personal identifying
21 information to attempt to rent an apartment in R.R.'s name.

22 d. Defendant FISHER would use victim R.R.'s personal
23 identifying information and bank account information to transfer, and
24 attempt to transfer, funds from the 0830 Account into a personal
25 checking account that defendant FISHER created without R.R.'s
26 authorization, with an account number ending in 0635 (the "Fraudulent
27 Account"). In doing so, defendant FISHER falsely represented to Bank
28 of America that he was R.R. and was authorized to access and use

1 R.R.'s accounts and personal identifying information, and concealed
2 from Bank of America that he was not R.R. nor did he have R.R.'s
3 consent to transfer funds from the 0830 Account to the Fraudulent
4 Account.

5 e. Defendant FISHER would also use victim R.R.'s Bank of
6 America business credit card, the 0063 Account, to make, and attempt
7 to make, fraudulent purchases at various places in Los Angeles
8 County, within the Central District of California, and elsewhere,
9 without R.R.'s permission or authorization. In doing so, defendant
10 FISHER falsely represented to Bank of America that he was R.R., or
11 was otherwise an authorized user of the credit card associated with
12 the 0063 Account, and concealed from Bank of America that he was not
13 R.R. and did not have authority or R.R.'s consent to use the credit
14 card associated with the 0063 Account.

15 f. Defendant FISHER would use R.R.'s personal identifying
16 information and bank account information to attempt to pay his bail
17 upon his arrest by local law enforcement.

18 6. Through his scheme, defendant FISHER fraudulently obtained
19 approximately \$32,892.59 to which he knew he was not entitled.

20 C. EXECUTION AND ATTEMPTED EXECUTION OF THE FRAUDULENT SCHEME

21 7. On or about the following dates, in Los Angeles County,
22 within the Central District of California, defendant FISHER committed
23 the following acts, each of which constituted an execution or
24 attempted execution of the fraudulent scheme:

COUNT	DATE	ACT
ONE	August 1, 2019 Attempted Execution	Attempted to transfer approximately \$13,644.56 from the 0830 Account into the Fraudulent Account, at a Bank of America Branch in Altadena, California.
TWO	August 9, 2019 Execution	Used a Bank of America credit card associated with the 0063 Account to rent a Karma Revero GT for \$2,036.15 from Enterprise Los Angeles International Airport Exotics and Luxury Car Rental, in Los Angeles, California.

COUNT THREE

[18 U.S.C. § 1028A(a)(1)]

On or about August 1, 2019, in Los Angeles County, within the Central District of California, and elsewhere, defendant TIMOTHY JEROME FISHER knowingly possessed and used, without lawful authority, means of identification that defendant FISHER knew belonged to another person, namely, the name and date of birth of victim R.R., during and in relation to the offense of Attempted Bank Fraud, a felony violation of Title 18, United States Code, Section 1344(2), as charged in Count One of this Indictment.

COUNT FOUR

[18 U.S.C. § 1028A(a)(1)]

On or about August 9, 2019, in Los Angeles County, within the Central District of California, and elsewhere, defendant TIMOTHY JEROME FISHER knowingly possessed and used, without lawful authority, a means of identification that defendant FISHER knew belonged to another person, namely, the name of victim R.R., during and in relation to the offense of Bank Fraud, a felony violation of Title 18, United States Code, Section 1344(2), as charged in Count Two of this Indictment.

A TRUE BILL

/S/

Foreperson

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